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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 BRENDA TOLENTINO-ESTRADA,  
14 Defendant.

Case No. 2:20-cr-004-RFB-VCF

**STIPULATION FOR EXTENSION OF**  
**TIME TO FILE DEFENDANT'S**  
**REPLY TO THE GOVERNMENT'S**  
**RESPONSE TO MOTION TO**  
**SUPPRESS**  
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
17 Trutanich, United States Attorney, and Travis Leverett, Assistant United States Attorney,  
18 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
19 and Heidi Ojeda, Assistant Federal Public Defender, counsel for Brenda Tolentino-Estrada, that  
20 the reply to the Government's response to motion to Suppress currently due on April 7, 2020,  
21 be vacated and continued and reset for April 21, 2020.

22 This Stipulation is entered into for the following reasons:

- 23 1. The Government recently produced additional discovery and defense counsel  
24 needs additional time to review and discuss with her client.
- 25 2. Defense is seeking additional time to file a reply to the Government's response.
- 26 3. The defendant is not in custody and agrees with the need for the continuance.

1           4.       The parties agree to the continuance and extension of time.

2           5.       Additionally, denial of this request for continuance could result in a miscarriage  
3 of justice. The additional time requested by this Stipulation is excludable in computing the time  
4 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United  
5 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,  
6 Section 3161(h)(7)(B)(i), (iv).

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8           This is the first request for an extension of time.

9           DATED this 6th day of April 2020.

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11       RENE L. VALLADARES  
12       Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

13       /s/ *Heidi Ojeda*  
14       By \_\_\_\_\_  
15       HEIDI OJEDA  
16       Assistant Federal Public Defender

/s/ *Travis Leverett*  
By \_\_\_\_\_  
TRAVIS LEVERETT  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 BRENDA TOLENTINO-ESTRADA,

7 Defendant.

Case No. 2:20-cr-004-RFB-VCF

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the brief currently due on Tuesday,  
11 April 7, 2020, be filed and continued to Tuesday, April 21, 2020.

12 DATED this 14<sup>th</sup> of April 2020.

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15 RICHARD F. BOULWARE, II  
16 UNITED STATES DISTRICT JUDGE  
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